UNITED STATES DISTRICT COURT
Western District of Arkansas – Fort Smith Division

Jonathan Daniel Clements, Plaintiff
v.
State of Arkansas, et al., Defendants

Civil Action No. _____ (to be assigned)

MOTION TO DISMISS STATE CITATIONS AND RELATED PROCEEDINGS

Comes now **Jonathan Daniel Clements**, Plaintiff, and moves this Honorable Court to dismiss or vacate all state-issued citations and related proceedings presently pending in the following courts:

> [List each case number, date, and issuing court.]

1. Basis for Federal Jurisdiction
This motion arises under 28 U.S.C. § 1331 and § 1343 (federal question and civil-rights jurisdiction) and 18 U.S.C. § 1964 (civil remedies under the Racketeer Influenced and Corrupt Organizations Act).

2. Grounds for Dismissal
(a) The citations were issued in retaliation for protected activity and violate constitutional guarantees of due process and equal protection.
(b) The citations were issued after lawful ecclesiastical filings and within the scope of trust property, placing them outside state commercial jurisdiction.
(c) State authorities acted without lawful authority once federal and ecclesiastical notice was served and unrebutted.

3. Relief Requested
Plaintiff respectfully requests that this Court:

> Dismiss all pending citations listed above;

Order that no further state action be taken on those matters while federal review is pending; and

> Grant such other and further relief as the Court deems just and proper.

Date: [Month Day, Year]
Respectfully submitted,

Jonathan Daniel Clements
Plaintiff, pro se
[Mailing or Sanctuary Address]

VERIFICATION / DECLARATION UNDER PENALTY OF PERJURY

I, **Jonathan Daniel Clements**, am the undersigned party in this action.
I declare that I have read the foregoing *Notice of Removal of State Proceedings to Federal Court* and that the statements contained in it, and in any exhibits attached, are true and correct to the best of my knowledge, information, and belief.

I understand that this declaration is made under penalty of perjury pursuant to 28 U.S.C. § 1746 and that the same force and effect is given as if sworn before a notary public.

Executed on this ___ day of _____ 20___, at Booneville, Arkansas.